

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**COMMONWEALTH OF PUERTO RICO,  
et al.,**

Defendants.

CIVIL NO. 12-2039 (GAG)

**MOTION FOR EXTENSION OF TIME TO FILE THE ITS ACTION PLAN  
IN COMPLIANCE WITH ORDER AT DOCKET NO. 1175**

TO THE HONORABLE COURT:

COME NOW Defendants Commonwealth of Puerto Rico and Puerto Rico Police Department (“Defendants” and/or “PRPB”), by and through the undersigned counsel, and respectfully state and pray as follows:

1. On April 2, 2019, PRPB, Plaintiff United States of America (“USDOJ”), and the Monitor (jointly, where appropriate, the “Parties”) filed a Joint Motion in Compliance with Order D.E. 1134 informing the Court of the status of PRPB’s information technology projects and electronic systems (“ITS”). As to the plan of action for the rapid, efficient and appropriate data collection required by the Court in D.E. 1134, the Parties requested thirty (30) days to develop a plan that takes into consideration all of the substantive requirements of the Agreement for the Sustainable Reform of the PRPB (“Agreement”) that the ITS systems are intended to support, and not only the stand-alone ITS requirements of the Agreement.

2. The Court noted the Parties' submission and approved the Parties' proposed thirty (30) day period to file the plan of action. *See* Docket No. 1175.
3. The PRPB is currently preparing a comprehensive plan that effectively addresses the PRPB's ITS needs and sets forth a reasonable implementation timeline for the substantive areas of the Agreement that require ITS support. Due to the complexity of the project, the PRPB requires a brief extension of time to comply with the Court's order.
4. The PRPB hereby requests a thirty (30) day extension to finalize the proposed action plan and to discuss it with the Parties.
5. The PRPB discussed the instant petition with counsel for the USDOJ and with the Monitor, both of whom expressed no objection to PRPB's request for additional time.
6. This request is made in good faith and is not meant to delay these proceedings.

**WHEREFORE**, Defendants respectfully request that the Court GRANT the above and afford the PRPB a thirty (30) day extension of time to submit the ITS action plan, with any additional relief it deems just and proper.

**RESPECTFULLY SUBMITTED.**

**WE HEREBY CERTIFY:** That today we have electronically filed the foregoing document with the Clerk of the Court for the District of Puerto Rico, using the CM/ECF system which will send a copy and notification of filing to all counsel of record.

In San Juan, Puerto Rico, this 2nd day of May 2019.

By:

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